

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

Verisign, Inc.,

Plaintiff,

v.

XYZ.com, LLC et al,

Defendants.

Civil Action No. 1:14-cv-01749 CMH-MSN

RULE 26(a)(3) PRETRIAL DISCLOSURES BY DEFENDANTS
XYZ.COM LLC AND DANIEL NEGARI

Pursuant to Fed. R. Civ. P. 26(a)(3) and the Court's March 30, 2015 Scheduling Order (ECF 24), Defendants XYZ.com LLC ("XYZ") and Daniel Negari disclose the following information about the evidence they may present at trial, other than that used solely for impeachment.

I. WITNESS LIST

Pursuant to Fed. R. Civ. P. 26(a)(3)(i) and the Court's March 30, 2015 Scheduling Order, Defendants identify the following list of witnesses expected to be or who may be called if the need arises. Defendants reserve the right to present any witnesses identified by Plaintiff, and to present additional non-expert witnesses for the purpose of impeachment or rebuttal.

A. Witnesses Expected to Be Called

Defendants expect to present the following witnesses at trial:

1. Daniel Negari
c/o Newman Du Wors LLP
100 Wilshire Boulevard, Suite 940
Santa Monica, California 90401
Telephone: (310) 359-8200

Expected to testify about subjects including the .XYZ registry business, allegations in Plaintiff's Complaint and related topics, and XYZ's financial information.

2. Samuel Hewitt
GlassRatner Advisory and Capital Group, LLC
Monarch Tower
3424 Peachtree Road, Suite 2150
Atlanta, Georgia 30326
Telephone: (404) 835-8850

Expected to testify as an expert witness regarding damages allegedly suffered by Plaintiff as a result of statements and conduct attributed to Defendants and the relevant accounting rules under U.S. Generally Accepted Accounting Principles (GAAP) as they relate to Web.com's XYZ loyalty offer and the advertising Web.com performed for XYZ.

3. Hal Poret
142 Hunter Avenue
Sleepy Hollow, New York 10591
Telephone: (914) 772-5087

Expected to testify as an expert witness regarding a survey conducted by Plaintiff's expert, Michael Mazis.

4. Jothan Frakes
313 South 219th Street
Normandy Park, Washington 98198
Telephone: (206) 355-0230

Expected to testify as an expert regarding the availability of domain names in the .COM top-level domain registry and the alleged harm Plaintiff's domain name registry business suffered as a result of statements and conduct attributed to Defendants.

5. Thies Lindenthal
19 Silver Street,
Cambridge, Cambridgeshire, CB3 9 EP, UK
Telephone: +44 (798) 260-9705

Expected to testify as an expert regarding damages allegedly suffered by the Plaintiff of statements and conduct attributed to Defendants.

B. Witnesses Who May Be Called

Defendants may call the following witnesses at trial if the need arises:

1. Shayan Rostam
c/o Newman Du Wors LLP

100 Wilshire Boulevard, Suite 940
Santa Monica, California 90401
Telephone: (310) 359-8200

May testify about subjects including the .XYZ registry business.

2. Grant Carpenter
c/o Newman Du Wors LLP
100 Wilshire Boulevard, Suite 940
Santa Monica, California 90401
Telephone: (310) 359-8200

May testify about subjects including the .XYZ registry business, allegations in Plaintiff's Complaint and related topics, and XYZ's financial information.

3. Pat Kane
Verisign, Inc.
Senior Vice President, Naming and Directory Services
12061 Bluemont Way
Reston, Virginia 20190
Telephone: (703) 948-3200

May testify about subjects including the basis for the allegations in Plaintiff's Complaint, Plaintiff's .COM and .NET registry business, the effect of the introduction of new top-level domains on Plaintiff's registry business, Plaintiff's marketing practices and technical operations, the alleged impact of Defendants' alleged conduct on Plaintiff, and related topics.

4. James Hubler
Verisign, Inc.
Director and Senior Corporate Counsel
12061 Bluemont Way
Reston, Virginia 20190
Telephone: (703) 948-3200

May testify about subjects including the basis for the allegations in Plaintiff's Complaint and related topics.

5. Zachary Salata
Ernst & Young LLP
1 Independent Drive, Suite 1701
Jacksonville, Florida 32202
Telephone: (904) 358-4523

May testify about subjects including Web.com Group, Inc.'s recognition of revenue from a transaction with XYZ.

6. Michelle Maingot
Ernst & Young LLP
401 East Jackson Street, Suite 1200
Tampa, Florida 33602
Telephone: (818) 225-4968

May testify about subjects including Web.com Group, Inc.'s recognition of revenue from a transaction with XYZ.

7. Sterling Auty
J.P. Morgan Securities LLC
277 Park Avenue
Manhattan, New York 10017
Telephone: (212) 272-2000

May testify about subjects including the impact of new top-level domains on the domain name industry and on Verisign's registry business.

8. David Atchley
Treasury and Investor Relations
Verisign, Inc.
12061 Bluemont Way
Reston, Virginia 20190
Telephone: (703) 948-3200

May testify about J.P. Morgan's analysis of the impact of new top-level domains on the domain name industry and on Verisign's registry business.

C. Witness Whose Testimony Defendants Expect to Present by Deposition

Pursuant to Fed. R. Civ. P. 26(a)(3)(ii) and the Court's March 30, 2015 Order, Defendants expect to present testimony from Web.com Group, Inc.'s corporate representative, Jason Teichman, by deposition noticed by Plaintiff and taken on August 4, 2015 in Jacksonville, Florida. The testimony relates to Web.com's transaction with XYZ, Web.com's XYZ loyalty offer, and advertising services that Web.com provided to XYZ.

Defendants reserve the right to supplement this disclosure, within a reasonable period, if a witness unexpectedly becomes unavailable to provide live testimony. Insofar as Plaintiff designates witness testimony to be presented by deposition, Defendants reserve the right to

introduce additional deposition testimony from the same witnesses or to call these witnesses for live testimony.

II. EXHIBIT LIST

Pursuant to Fed. R. Civ. P. 26(a)(3)(iii) and the Court's March 30, 2015 Scheduling Order, Defendants identify the following exhibits that they expect to or may introduce at trial if the need arises. Defendants reserve the right to supplement the following list to include any additional documents received from Plaintiff and/or third parties pursuant to a subpoena after the filing of this pretrial disclosure. Defendants also reserve the right to introduce any exhibits identified by Plaintiff and offer additional exhibits for impeachment or rebuttal.

Defendants identify these exhibits without waiving their right to object to Plaintiff's introduction of any such exhibits at trial.

A. Exhibits expected to be used at trial

No.	Description	Date	Bates No.	Conf.
1	Email from Min Leone to Pat Kane, Scott Schnell, et al. attaching Verisign Questions for Naming Business, January 16, 2015	1/22/15	VRSN0000005619	Conf.
2	Verisign Questions for Naming Business, January 16, 2015	1/16/15	VRSN0000005621	AEO
3	Email from Patrick Brenner to Pat Kane, Scott Schnell, et al. attaching Verisign Inc.'s Questions for Naming Business, April 8, 2015	4/21/15	VRSN0000003616	
4	Verisign, Inc. Questions for Naming Business, April 8, 2015		VRSN0000003617	AEO
5	Email from Luci Altman to Pat Kane, Scott Schnell, et al. attaching Verisign, Inc. Questions for Naming Business, July 10, 2014	7/15/14	VRSN0000049877	Conf.
6	Verisign, Inc. Questions for Naming Business, July 10, 2014	7/10/14	VRSN0000049879	AEO

No.	Description	Date	Bates No.	Conf.
7	.com Criticism & Positive Mentions Media Coverage Report March 31, 2014 – April 7, 2014	4/7/14	VRSN0000006352	AEO
8	Email from Kaitlin Holden to Scott Schnell et al. attaching .com Criticism & Positive Mentions Media Coverage Report April 21, 2014 – April 28, 2014	4/28/14	VRSN0000041269	Conf.
9	.com Criticism & Positive Mentions Media Coverage Report April 21, 2014 – April 28, 2014	4/28/14	VRSN0000041270	AEO
10	Email from Kaitlin Holden to Scott Schnell, Pat Kane, et al. attaching .com Criticism & Positive Mentions Media Coverage Report May 27 – June 2, 2014	6/2/14	VRSN0000004034	AEO
11	.com Criticism & Positive Mentions Media Coverage Report May 27 – June 2, 2014	6/2/14	VRSN0000004035	AEO
12	Email from Kaitlin Holden to Scott Schnell, Pat Kane, et al. attaching .com Criticism & Positive Mentions Media Coverage Report June 2 - June 9, 2014	6/10/14	VRSN0000003826	AEO
13	.com Criticism & Positive Mentions Media Coverage Report June 2 - June 9, 2014	6/9/14	VRSN0000003827	AEO
14	Email from Kaitlin Holden to Scott Schnell, Pat Kane, et al. attaching .com Criticism & Positive Mentions Media Coverage Report June 9 – June 16, 2014	6/16/14	VRSN0000004241	AEO
15	.com Criticism & Positive Mentions Media Coverage Report June 9 – June 16, 2014	6/16/14	VRSN0000004242	AEO
16	Email from Kaitlin Holden to Scott Schnell, Pat Kane, et al. attaching .com Criticism & Positive Mentions Media Coverage Report June 30 – July 7, 2014	7/7/14	VRSN0000004340	Conf.
17	.com Criticism & Positive Mentions Media Coverage Report June 30 – July 7, 2014	7/7/14	VRSN0000004341	AEO

No.	Description	Date	Bates No.	Conf.
18	Email from Kaitlin Holden to Scott Schnell, Pate Kane, et al. attaching .com Criticism & Positive Mentions Media Coverage Report July 7 – 14, 2014	7/15/14	VRSN0000004450	AEO
19	.com Criticism & Positive Mentions Media Coverage Report July 7 – 14, 2014	7/14/14	VRSN0000004451	AEO
20	Email from Kaitlin Holden to Scott Schnell, Pate Kane, et al. attaching .com Criticism & Positive Mentions Media Coverage Report August 12 – 21, 2014	8/21/14	VRSN0000050570	AEO
21	.com Criticism & Positive Mentions Media Coverage Report August 12 – 21, 2014	8/21/14	VRSN0000050571	AEO
22	Email from Kaitlin Holden to Scott Schnell, Pat Kane, et al. attaching .com Criticism & Positive Mentions Media Coverage Report August 21 – 26, 2014	8/26/14	VRSN0000006274	Conf.
23	.com Criticism & Positive Mentions Media Coverage Report August 21 – 26, 2014	8/26/14	VRSN0000006275	AEO
24	.com Criticism & Positive Mentions Media Coverage Report August 26 – September 2, 2014	9/2/14	VRSN0000006621	AEO
25	Email from Scott Schnell to Min Leone attaching 2015 Marketing Update PowerPoint Presentation by Scott Schnell	3/2/15	VRSN0000002000	AEO
26	2015 Marketing Update PowerPoint Presentation by Scott Schnell	3/3/15	VRSN0000002001	AEO
27	Email from Michael Chase to Scott Schnell regarding call with Andrew Gorrin discussing Network Solutions' promotion with XYZ	6/5/14	VRSN0000003009	AEO
28	Letter from Thomas Indelicarto to Matthew McClure (Web.com) regarding the registration of gtld-servers.xyz	8/7/14	VRSN0000003536	AEO
29	Email from Min Leone to John Ho regarding Q3 2014 Diligence Questionnaire	12/22/14	VRSN0000003133	AEO
30	Verisign Questions for Naming Business October 7, 2014	10/7/14	VRSN0000003134	AEO

No.	Description	Date	Bates No.	Conf.
31	Email from Michelle Romano to Lori Shepherd attaching US Go to Market 2015 PowerPoint Presentation	12/30/14	VRSN0000004972	AEO
32	US Go to Market 2015 PowerPoint Presentation		VRSN0000004974	AEO
33	Email from Min Leone to Scott Schnell attaching Domain Business Update PowerPoint Presentation	2/2/15	VRSN0000005829	Conf.
34	Domain Business Update PowerPoint Presentation	February 2015	VRSN0000005830	AEO
35	Email from Jim Bidzos to Pat Kane and Scott Schnell regarding Web.com and Network Solutions	6/4/14	VRSN0000037095	Conf.
36	Email from Scott Schnell to Jim Bidzos regarding Web.com and Network Solutions	6/4/14	VRSN0000037106	AEO
37	Email from Scott Schnell to Jim Bidzos regarding Web.com and Network Solutions	6/4/14	VRSN0000037111	AEO
38	Email from Scott Schnell to Jim Bidzos attaching Domain Name Marketing & Account Management Update PowerPoint Presentation by Scott Schnell	2/5/15	VRSN0000039889	AEO
39	Domain Name Marketing & Account Management Update PowerPoint Presentation by Scott Schnell	2/10/15	VRSN0000039890	AEO
40	Redline of #InternetOfficial Contest Post Mortem		VRSN0000060126	AEO
41	Expert Report of Samuel Hewitt			AEO
42	Expert Report of Hal Poret			AEO
43	Expert Report of Thies Lindenthal			AEO
44	Expert Report of Jothan Frakes			AEO
45	Spreadsheet of Respondents' Responses to Michael Mazis's Survey Questions			
46	Google Analytics for webpage /believe/ Jan 1, 2013 - Dec 23, 2014		XYZ 00073571	AEO

No.	Description	Date	Bates No.	Conf.
47	Google Analytics for webpage /believe/ Jan 1, 2013 – Jun 2, 2015		XYZ 00073572	AEO
48	Google Analytics for webpage /boooooooooom/ Jan 1, 2013 – Dec 23, 2014		XYZ 00073573	AEO
49	Google Analytics for webpage /boooooooooom/ Jan 1, 2013 – Jun 2, 2015		XYZ 00073574	AEO
50	Google Analytics for webpage /com-net-xyz/ Jan 1, 2013 – Dec 23, 2014		XYZ 00073575	AEO
51	Google Analytics for webpage /com-net-xyz/ Jan 1, 2013 – Jun 2, 2015		XYZ 00073576	AEO
52	Google Analytics for webpage /teamwork/ Jan 1, 2013 – Dec 23, 2014		XYZ 00073577	AEO
53	Google Analytics for webpage /teamwork/ Jan 1, 2013 – Jun 2, 2015		XYZ 00073578	AEO
54	Google Analytics for webpage /blog/xyz-the-next-com Jan 1, 2013 – Dec 23, 2014		XYZ 00073579	AEO
55	Google Analytics for webpage /blog/xyz-the-next-com Jan 1, 2013 – Jun 2, 2015		XYZ 00073580	AEO
56	Google Analytics for webpage /registrars Jan 1, 2013 – Dec 23, 2014			AEO
57	Google Analytics for webpage /registrars Jan 1, 2013 – Jun 2, 2015			AEO
58	Email from David Kestenbaum to hello@xyz.com regarding National Public Radio request	3/27/14	XYZ 00073581	Conf.
59	Email from David Kestenbaum to hello@xyz.com regarding National Public Radio Interview	3/27/14	XYZ 00073582	Conf.
60	Email from Daniel Negari to David Kestenbaum regarding National Public Radio Interview	3/28/14	XYZ 00073583	Conf.
61	CentralNic gTLD Services Agreement Amendment No. 4 Signed by Ben Crawford		XYZ 00221903	AEO

No.	Description	Date	Bates No.	Conf.
62	CentralNic gTLD Services Agreement Amendment No. 4 Signed by Daniel Negari		XYZ 00221906	AEO
63	CentralNic Invoice for August 2014	8/31/14	XYZ 00221857	AEO
64	CentralNic Invoice for September 2014	9/30/14	XYZ 00221880	AEO
65	CentralNic Invoice for October 2014	10/31/14	XYZ 00221879	AEO
66	CentralNic Invoice for November 2014	11/30/14	XYZ 00221878	AEO
67	CentralNic Invoice for December 2014	12/31/14	XYZ 00221875	AEO
68	CentralNic Invoice for January 2015	1/31/15	XYZ 00222181	AEO
69	CentralNic Invoice for February 2015	2/28/15	XYZ 00222102	AEO
70	CentralNic Invoice for March 2015	3/31/15	XYZ 00222103	AEO
71	CentralNic Invoice for April 2015	4/30/15	XYZ 00222104	AEO
72	CentralNic Invoice for May 2015	5/31/15	XYZ 00222105	AEO
73	CentralNic Invoice for June 2014	6/30/14	XYZ 00221877	AEO
74	CentralNic Invoice for July 2014	7/31/14	XYZ 00221876	AEO
75	Network Solutions Invoice 7/1/14		XYZ00140312	AEO
76	Network Solutions Invoice 7/1/14 Paid	7/1/14	XYZ00187977	AEO
77	Network Solutions Invoice 8/5/14	8/5/14	XYZ 00155397	AEO
78	Network Solutions Invoice 8/5/14 Paid	8/5/14	XYZ00155083	AEO
79	Network Solutions Invoice 9/18/14	9/18/14	XYZ 00172649	AEO
80	Network Solutions Invoice 9/18/14 Paid	9/18/14	XYZ00172680	AEO
81	ICANN Invoices for 2014 and 2015		XYZ 00221881	AEO
82	XYZ.COM LLC Balance Sheet as of December 31, 2012	12/31/12	XYZ 00222804	AEO
83	XYZ.COM LLC Statement of Cash Flows January through December 2012		XYZ 00222092	AEO
84	XYZ.COM LLC Profit & Loss January through December 2012		XYZ 00222093	AEO
85	XYZ.COM LLC Balance Sheet as of December 31, 2013		XYZ 00222094	AEO
86	XYZ.COM LLC Statement of Cash Flows January through December 2013		XYZ 00222095	AEO

No.	Description	Date	Bates No.	Conf.
87	XYZ.COM LLC Profit & Loss January through December 2013		XYZ 00222096	AEO
88	XYZ.COM LLC Balance Sheet as of December 31, 2014		XYZ 00222099	AEO
89	XYZ.COM LLC Statement of Cash Flows January through December 2014		XYZ 00222100	AEO
90	XYZ.COM LLC Profit & Loss January through December 2014		XYZ 00222101	AEO
91	XYZ.COM LLC Balance Sheet as of June 30, 2015		XYZ 00222106	AEO
92	XYZ.COM LLC Statement of Cash Flows January through June 2015		XYZ 00222107	AEO
93	XYZ.COM LLC Profit & Loss January through June 2015		XYZ 00222108	AEO
94	XYZ.COM LLC 2012 Federal Tax Return		XYZ 00223141	AEO
95	XYZ.COM LLC 2013 Federal Tax Return		XYZ 00223158	AEO
96	XYZ.COM LLC 2014 Federal Tax Return		XYZ 00223119	AEO
97	XYZ Rebate Tracker for 2014 and 2015		XYZ 00222130	AEO
98	XYZ.COM LLC Transaction Detail for Network Solutions January through December 2014		XYZ 00222097	AEO
99	GoDaddy Launch Plans & Proposal for .XYZ PowerPoint Presentation		XYZ 00222110	AEO
100	Web.com Advertising Insertion Order	5/20/14	WEB000017	Conf.
101	Web.com Marketing Agreement	5/20/14	WEB000027	AEO
102	Web.com Advertising Revenue	12/31/14	EY-000544	
103	Email promoting .xyz domain names sent from Network Solutions	6/28/14	XYZ 00222125	
104	XYZ placement on the Web.com's Account Manager webpage	2/9/15	XYZ 00222119	
105	XYZ placement on the Network Solutions' domain name registration webpage	6/27/14	XYZ 00222120	
106	XYZ placement on the Network Solutions' Index webpage	6/27/14	XYZ 00222121	

No.	Description	Date	Bates No.	Conf.
107	XYZ placement on Network Solutions' domain name search results webpage	9/5/14	XYZ 00222122	
108	XYZ placement on Network Solutions' domain name search results tld webpage	6/27/14	XYZ 00222123	
109	XYZ placement on Network Solutions' domain name search results tld webpage	6/27/14	XYZ 00222124	
110	XYZ placement on Networks Solutions' webpage	6/27/14	XYZ 00222127	
111	XYZ placement on Network Solutions' domain name registration webpage	6/27/14	XYZ 00222128	
112	XYZ placement on Network Solutions' domain name search results webpage	6/27/14	XYZ 00222129	
113	Verisign's CEO Jim Bidzos on Q3 2014 Results – Earnings Call Transcript	10/23/14	XYZ 00222711	
114	XYZ's analysis table of .com availability		XYZ 00222091	
115	Chart Showing Domain Volume and Timeline per Top Level Domain		XYZ 00222795	
116	Chart Showing Domain Volume and Timeline per Top Level Domain		XYZ 00222796	
117	Chart Showing Domain Volume and Timeline per Top Level Domain (TLD)		XYZ 00222797	
118	Domain Names per TLD, By Date for .net (January 2014 – June 2015)		XYZ 00222798	
119	Domain Names per TLD, By Date for .net, .xyz, and .org (January 2014 – June 2015)		XYZ 00222799	
120	Domain Names per TLD, By Date for .net and .xyz (January 2014 – June 2015)		XYZ 00222800	
121	Domain Names per TLD, By Date for .org (January 2014 – June 2015)		XYZ 00222801	
122	Domain Names per TLD, by Date for .xyz (January 2014 – June 2015)		XYZ 00222803	
123	Legend & Footnotes for Document Graph of TLDs		XYZ 00222802	

No.	Description	Date	Bates No.	Conf.
124	Video statistics for YouTube “Move over .com - .xyz is for the next generation of the internet”	4/2/15	XYZ 00223237	
125	Video statistics for YouTube “Move over .com - .xyz is for the next generation of the internet”	8/12/15	XYZ 00223223	
126	“Move over .com - .xyz is for the next generation of the internet” video as referenced in the Complaint ¶¶ 17–23 and located at https://www.youtube.com/watch?v=uh_i13jluqs	6/16/14		
127	“.xyz is officially the #1 new domain extension” video as referenced in the Complaint ¶ 53(a) and located at https://www.youtube.com/watch?t=12&v=c4L8iFVKyww	6/6/14		
128	Excerpts from the transcript and videotaped deposition of Web.com Group, Inc.’s 30(b)(6) deposition taken on August 4, 2015 in Jacksonville, Florida.			

B. Exhibits Which May Be Used at Trial

No.	Description	Date	Bates No.	Conf.
129	ASC 605 Revenue Recognition			
130	ASC 845 Nonmonetary Transactions			
131	ASC 820 Fair Value Measurement			
132	Verisign Inc.’s Form 10-K for the Period Ending 12/31/14	02/13/15	VRSN0000000572	
133	Verisign 2014 Cooperative Marketing Fund Program Addendum		VRSN0000001746	AEO
134	Email from Afshaan Abdul to Michael Reed regarding Registrar Analysis ii PowerPoint Presentation	4/30/15	VRSN0000003884	Conf.

No.	Description	Date	Bates No.	Conf.
135	Registrar Analysis ii PowerPoint Presentation by Afshaan Abdul	March 2015	VRSN0000003885	AEO
136	Email from Scott Schnell to George E Kilguss regarding meetings with Web.com and GoDaddy	7/12/14	VRSN0000004438	AEO
137	Email from David Kestenbaum to hello@xyz.com regarding National Public Radio Interview	4/17/14	XYZ 00073584	Conf.
138	Email from Suzanne L. Chapman to Michael Reed et al. regarding Co-Op Proposal with GoDaddy	1/27/15	VRSN0000046160	AEO
139	Letter from Zedford D. Dancey to Maguy Serad (ICANN) regarding Network Solutions' XYZ Promotion	7/11/14	VRSN0000060458	AEO
140	Letter from Matt McClure (Web.com) to Thomas C. Indelicarto regarding Network Solutions' opt-out notifications	8/13/14	VRSN0000060461	Conf.
141	Email from Maguy Serad (ICANN) to Zedford Dancey regarding Network Solutions' XYZ promotion	7/17/14	VRSN0000060463	AEO
142	Email from Dan Gregson (Web.com) to Zachary Salata regarding Web.com's advertising agreement with XYZ	7/24/14	EY-000042	Conf.
143	New gTLDs: Competitive Tactics, Verisign Marketing Strategy and Plan PowerPoint Presentation	7/22/14	VRSN0000038789	AEO
144	Letter from Brian Winterfeldt to Maguy Serad (ICANN) regarding ICANN compliance relating to Web.com's promotion of XYZ	8/6/14	WEB003096	AEO
145	Email from Joy Morel to Michael Reed attaching The Americas & Australia GTM Plan Q1 2015 PowerPoint Presentation	3/23/15	VRSN0000002177	AEO
146	The Americas & Australia GTM Plan Q1 2015 PowerPoint Presentation		VRSN0000002178	AEO

No.	Description	Date	Bates No.	Conf.
147	Email from Scott Schnell to George Kilguss attaching Q2 Market Intel – North America	7/16/14	VRSN0000004531	AEO
148	Q2 Market Intel – North America		VRSN0000004533	AEO
149	Verisign Honors the ".com 25" and Unveils Internet Infrastructure Grants Webpage	5/26/10		
150	Hover Article: Top 20 gTLDs - August 18 – 24, 2014	8/25/14	XYZ 00073587	
151	Forbes Article: Domain Already Taken? Do What Google Did And Try A Not-Com Name	8/11/15		
152	Email from Sterling P Auty (J.P. Morgan) to David Atchley attaching Domain Name Industry Takeaways from ICANN Conference Call on gTLDs	1/9/14	JPMC 00000001	Conf.
153	J.P. Morgan Domain Name Industry Takeaways from ICANN Conference Call on gTLDs	1/9/14	JPMC00000006	Conf.
154	J.P. Morgan Verisign Equity Research	1/22/15	JPMC 00000575	Conf.
155	"Alphabet Frenzy: .Xyz Registrations Rise in Google's Wake" video located at http://www.bloomberg.com/news/videos/2015-08-12/alphabet-frenzy-xyz-registrations-rise-in-google-s-wake	8/12/15		
156	.com January 2014 Activity Report	January 2014	XYZ 00222375	
157	.com January 2014 Operator Report	January 2014	XYZ 00222463	
158	.com January 2014 Transactions Report	January 2014	XYZ 00222386	
159	.com February 2014 Activity Report	February 2014	XYZ 00222376	
160	.com February 2014 Operator Report	February 2014	XYZ 00222473	

No.	Description	Date	Bates No.	Conf.
161	.com February 2014 Transactions Report	February 2014	XYZ 00222387	
162	.com March 2014 Activity Report	March 2014	XYZ 00222377	
163	.com March 2014 Operator Report	March 2014	XYZ 00222483	
164	.com March 2014 Transactions Report	March 2014	XYZ 00222388	
165	.com April 2014 Activity Report	April 2014	XYZ 00222378	
166	.com April 2014 Operator Report	April 2014	XYZ 00222493	
167	.com April 2014 Transactions Report	April 2014	XYZ 00222389	
168	.com May 2014 Activity Report	May 2014	XYZ 00222379	
169	.com May 2014 Operator Report	May 2014	XYZ 00222503	
170	.com May 2014 Transactions Report	May 2014	XYZ 00222390	
171	.com June 2014 Activity Report	June 2014	XYZ 00223207	
172	.com June 2014 Operator Report	June 2014	XYZ 00222513	
173	.com June 2014 Transactions Report	June 2014	XYZ 00222391	
174	.com July 2014 Activity Report	July 2014	XYZ 00223208	
175	.com July 2014 Operator Report	July 2014	XYZ 00222523	
176	.com July 2014 Transactions Report	July 2014	XYZ 00222392	
177	.com August 2014 Activity Report	August 2014	XYZ 00223209	
178	.com August 2014 Operator Report	August 2014	XYZ 00222533	
179	.com August 2014 Transactions Report	August 2014	XYZ 00222393	
180	.com September 2014 Activity Report	September 2014	XYZ 00223210	
181	.com September 2014 Operator Report	September 2014	XYZ 00222543	
182	.com September 2014 Transactions Report	September 2014	XYZ 00222394	
183	.com October 2014 Activity Report	October 2014	XYZ 00222380	

No.	Description	Date	Bates No.	Conf.
184	.com October 2014 Operator Report	October 2014	XYZ 00222553	
185	.com October 2014 Transactions Report	October 2014	XYZ 00222395	
186	.com November 2014 Activity Report	November 2014	XYZ 00222381	
187	.com November 2014 Operator Report	November 2014	XYZ 00222563	
188	.com November 2014 Transactions Report	November 2014	XYZ 00222396	
189	.com December 2014 Activity Report	December 2014	XYZ 00222382	
190	.com December 2014 Operator Report	December 2014	XYZ 00222573	
191	.com December 2014 Transactions Report	December 2014	XYZ 00222397	
192	.com January 2015 Activity Report	January 2015	XYZ 00222383	
193	.com January 2015 Operator Report	January 2015	XYZ 00222583	
194	.com January 2015 Transactions Report	January 2015	XYZ 00222398	
195	.com February 2015 Activity Report	February 2015	XYZ 00222384	
196	.com February 2015 Operator Report	February 2015	XYZ 00222593	
197	.com February 2015 Transactions Report	February 2015	XYZ 00222399	
198	.com March 2015 Activity Report	March 2015	XYZ 00222385	
199	.com March 2015 Operator Report	March 2015	XYZ 00222603	
200	.com March 2015 Transactions Report	March 2015	XYZ 00222400	
201	.com April 2015 Activity Report	April 2015	XYZ 00223211	
202	.com April 2015 Transactions Report	April 2015	XYZ 00223212	

No.	Description	Date	Bates No.	Conf.
203	.net January 2014 Transactions Report	January 2014	XYZ 00222401	
204	.net February 2014 Transactions Report	February 2014	XYZ 00222402	
205	.net March 2014 Transactions Report	March 2014	XYZ 00222403	
206	.net April 2014 Transactions Report	April 2014	XYZ 00222404	
207	.net May 2014 Transactions Report	May 2014	XYZ 00222405	
208	.net June 2014 Transactions Report	June 2014	XYZ 00222406	
209	.net July 2014 Transactions Report	July 2014	XYZ 00222407	
210	.net August 2014 Transactions Report	August 2014	XYZ 00222408	
211	.net September 2014 Transactions Report	September 2014	XYZ 00222409	
212	.net October 2014 Transactions Report	October 2014	XYZ 00222410	
213	.net November 2014 Transactions Report	November 2014	XYZ 00222411	
214	.net December 2014 Transactions Report	December 2014	XYZ 00222412	
215	.net January 2015 Transactions Report	January 2015	XYZ 00222413	
216	.net February 2015 Transactions Report	February 2015	XYZ 00222414	
217	.net March 2015 Transactions Report	March 2015	XYZ 00222415	
218	.net April 2015 Transactions Report	April 2015	XYZ 00222416	
219	.xyz February 2014 Activity Report	February 2014	XYZ 00222435	
220	.xyz February 2014 Transactions Report	February 2014	XYZ 00222449	
221	.xyz March 2014 Activity Report	March 2014	XYZ 00222436	
222	.xyz March 2014 Transactions Report	March 2014	XYZ 00222450	
223	.xyz April 2014 Activity Report	April 2014	XYZ 00222437	
224	.xyz April 2014 Transactions Report	April 2014	XYZ 00222451	

No.	Description	Date	Bates No.	Conf.
225	.xyz May 2014 Activity Report	May 2014	XYZ 00222438	
226	.xyz May 2014 Transactions Report	May 2014	XYZ 00222452	
227	.xyz June 2014 Activity Report	June 2014	XYZ 00222439	
228	.xyz June 2014 Transactions Report	June 2014	XYZ 00222453	
229	.xyz July 2014 Activity Report	July 2014	XYZ 00222440	
230	.xyz July 2014 Transactions Report	July 2014	XYZ 00222454	
231	.xyz August 2014 Activity Report	August 2014	XYZ 00222441	
232	.xyz August 2014 Transactions Report	August 2014	XYZ 00222455	
233	.xyz September 2014 Activity Report	September 2014	XYZ 00222442	
234	.xyz September 2014 Transactions Report	September 2014	XYZ 00222456	
235	.xyz October 2014 Activity Report	October 2014	XYZ 00222443	
236	.xyz October 2014 Transactions Report	October 2014	XYZ 00222457	
237	.xyz November 2014 Activity Report	November 2014	XYZ 00222444	
238	.xyz November 2014 Transactions Report	November 2014	XYZ 00222458	
239	.xyz December 2014 Activity Report	December 2014	XYZ 00222445	
240	.xyz December 2014 Transactions Report	December 2014	XYZ 00222459	
241	.xyz January 2015 Activity Report	January 2015	XYZ 00222446	
242	.xyz January 2015 Transactions Report	January 2015	XYZ 00222460	
243	.xyz February 2015 Activity Report	February 2015	XYZ 00222447	
244	.xyz February 2015 Transactions Report	February 2015	XYZ 00222461	

No.	Description	Date	Bates No.	Conf.
245	.xyz March 2015 Activity Report	March 2015	XYZ 00222448	
246	.xyz March 2015 Transactions Report	March 2015	XYZ 00222462	
247	.xyz April 2015 Activity Report	April 2015	XYZ 00223275	
248	.xyz April 2015 Transactions Report	April 2015	XYZ 00223276	
249	Registrations of .COM domains from January 2002 – March 2015. (FRE 1006 summary of voluminous records: Verisign's .COM monthly registry reports from January 2002 – March 2015, copies of which will be provided at the agreed time for exchange of exhibits.)			
250	Registrations of .COM domains, January 2013 – March 2015. (FRE 1006 summary of voluminous records: Verisign's .COM monthly registry reports from January 2013 – March 2015, copies of which will be provided at the agreed time for exchange of exhibits.)			
251	Registrations of .NET domains, January 2002 – March 2015. (FRE 1006 summary of voluminous records: Verisign's .NET monthly registry reports from January 2002 – March 2015, copies of which will be provided at the agreed time for exchange of exhibits.)			
252	New registrations of .NET domains, January 2010 – May 2015. (FRE 1006 summary of voluminous records: Verisign's .NET monthly registry reports from January 2010 – March 2015, copies of which will be provided at the agreed time for exchange of exhibits.)			
253	New registrations of .NET domains, January 2010 – May 2015. (FRE 1006 summary of voluminous records: Verisign's .NET monthly registry reports from January 2010 – March 2015, copies of which will be provided at the agreed time for exchange of exhibits.)			

No.	Description	Date	Bates No.	Conf.
254	Verisign .COM domains in zone file, by day, January 2014–March 2015. (FRE 1006 summary of voluminous records: Verisign’s daily zone file counts which have already been produced and will be provided again at the agreed time for exchange of exhibits.)			
255	.COM domains under management, by month, January 2010 - March 2015. (FRE 1006 summary of voluminous records: Verisign’s .COM monthly registry reports from January 2010 – March 2015, copies of which will be provided at the agreed time for exchange of exhibits.)			
256	.COM domains under management, by month, January 2014 - March 2015. (FRE 1006 summary of voluminous records: Verisign’s .NET monthly registry reports from January 2014 – March 2015, copies of which will be provided at the agreed time for exchange of exhibits.)			
257	Verisign .NET domains in zone file, by day, January 2014–March 2015. (FRE 1006 summary of voluminous records: Verisign’s daily zone file counts which have already been produced and will be provided again at the agreed time for exchange of exhibits.)			
258	.NET new registrations, by month, January 2010–May 2015. (FRE 1006 summary of voluminous records: Verisign’s .NET monthly registry reports from January 2010 – March 2015, copies of which will be provided at the agreed time for exchange of exhibits.)			

No.	Description	Date	Bates No.	Conf.
259	.XYZ domains under management, by month, June 2014–March 2015. (FRE 1006 summary of voluminous records: .XYZ monthly registry reports from June 2014 – March 2015, which have already been produced and will be provided again at the agreed time for exchange of exhibits.)			

Dated August 20, 2015.

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CERTIFICATE OF SERVICE

I certify that on August 20, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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